

# Exhibit D

**From:** [Jennifer Blecher](#)  
**To:** [Garimella, Sesi V.](#)  
**Cc:** [Torres, Ivan](#); [Enzer, Samson](#); [Bansal, Anirudh](#); [tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com); [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com); [Amiad Kushner](#); [Jake Nachmani](#); [Dov Gold](#); [Josh Perles](#); [Ed Macallister](#); [Marco Molina](#); [Mortenson, Gregory](#)  
**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs  
**Date:** Tuesday, June 10, 2025 6:22:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

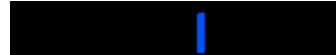
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Sesi,

We are prepared to meet and confer on Requests 1-3 and 9-10 as you request below. We do not think, however, that further discussion of these Requests will be productive in the absence of basic information about the sources of responsive documents and information your clients (or any third-party consultants or vendors of your clients) have, how it is maintained, and whether such documents and information were previously produced to the government as part of its investigation. We requested that information regarding these requests during the May 20, 2025 meet and confer. Defendants indicated on the last call that you would be speaking with your clients about these Requests, and we expect that you will have this information available before the next call. Please let us know your availability for that call.

- Jennifer

**Jennifer Blecher, Esq.** | Partner



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---

**From:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>

**Date:** Monday, June 9, 2025 at 7:10 PM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, [tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com), [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com) <[jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)>, Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, Josh Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, Ed Macallister <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>, Marco Molina <[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)>, Mortenson, Gregory <[GMortenson@cahill.com](mailto:GMortenson@cahill.com)>

**Subject:** RE: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Jennifer:

This is Defendants' joint response to your e-mail below. Defendants intend to stand on their objections to RFPs 4-8

and 11-19. However, we do not believe your email below accurately describes the many objections that we raised during two lengthy meet-and-confers. Among other things, these requests fall well outside the scope of jurisdictional discovery that Judge Koeltl authorized at page 13 of his motion to dismiss opinion. We have repeatedly asked you to confirm what Plaintiffs believe is the scope of jurisdictional discovery. In response, you stated during our last meet-and-confer that you did not wish to do that and that if you were to “uncover information that is not about the alleged theory, there’s no basis in law to say ‘you can’t amend [with] that information.’” This only confirms that Plaintiffs are on a fishing expedition.

As we have made clear, we are not willing to engage on requests for production that are not tied to the theory of jurisdiction for which the Court has authorized jurisdictional discovery. That said, we are willing to continue meeting and conferring in good faith on RFPs 1-3, and 9-10. While we believe that those requests are overbroad, we are willing to work with you to narrow them.

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**Sesi V. Garimella | Partner**

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---

**From:** Jennifer Blecher <jblecher@seidenlaw.com>

**Sent:** Tuesday, June 3, 2025 11:51 AM

**To:** Garimella, Sesi V. <SGarimella@cahill.com>

**Cc:** Torres, Ivan <ITorres@cahill.com>; Enzer, Samson <SEnzer@cahill.com>; Bansal, Anirudh <ABansal@cahill.com>; tgoodyguillen@bakerlaw.com; jwasick@bakerlaw.com; Amiad Kushner <akushner@seidenlaw.com>; Jake Nachmani <jnachmani@seidenlaw.com>; Dov Gold <dgold@seidenlaw.com>; Josh Perles <jperles@perleslaw.com>; Ed Macallister <emacallister@perleslaw.com>; Marco Molina <mmolina@bakerlaw.com>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Counsel,

We write regarding Defendants’ objections to Plaintiffs’ jurisdictional discovery requests. As we indicated in our May 23, 2025 email below, Defendants’ objections do not comply with the Federal Rules. The objections notably do not contain an agreement to produce a single document, fail to identify any objectionable portion of any request, and constitute impermissible boilerplate.

We have now had two meet and confers after we had served jurisdictional discovery demands on April 2, 2025 and received your responses on May 2, 2025. In these meet and confers, we laid out our reasoning and thinking regarding each of the RFPs served on your clients. Our understanding of the positions you took on both calls is that: (1) you believe that Request No. 4 is outside the scope of discovery for reasons not provided; (2) Request Nos. 14-18 are outside the scope of discovery on the basis that you do not believe that Plaintiffs’ allegations concerning Signature Bank or any entities not classified by Binance as VIPs (regardless of whether they were performing market making activity on the Binance exchange) were covered by the Court’s Order; and (3) Request No. 19 is outside the scope of discovery, again for unexplained reasons, and to the extent it seeks documents to which Mr.

Zhao no longer has access by virtue of government consent orders. We disagree with each of these positions. We asked that you confirm these positions in writing, consistent with the Federal Rules, and you again requested a “comfort letter” or similar such written representation regarding the scope of jurisdictional discovery. We stated that we will not do so, and we repeat that position again here.

During last week’s meet and confer, you stated that you would consult with your respective clients and get back to us sometime this week. On May 30, Magistrate Judge Moses ordered that:

Judge Moses will hold a conference on **July 1, 2025, at 10:00 a.m.**, in Courtroom 20A, 500 Pearl Street, New York, New York, to discuss the status of jurisdictional discovery, the anticipated schedule within which such discovery will be completed, and whether and when a pretrial scheduling order should be entered pursuant to Fed. R. Civ. P. 16(b). In advance of the conference, no later than **June 24, 2025**, the parties must submit a joint status letter addressing these issues.

We therefore reiterate our request on our last call that you confirm in writing whether our understanding of your specific objections above is correct and whether you plan to stand on the objections listed in your May 2, 2025 responses for the remaining requests. If so, we should begin drafting the joint status letter and submit that letter to the Court next week. Please let us know by this Friday, June 6, whether Defendants will stand on these objections (and if not, please provide any supplemental responses and objections by that date).

Regards,

Jennifer

**Jennifer Blecher, Esq.** | Partner



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**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Date:** Tuesday, May 27, 2025 at 2:13 PM

**To:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>

**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, [tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com), [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com) <[jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)>, Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, Josh Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, Ed Macallister <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>, Marco Molina <[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Thank you Sesi. I will circulate an invite.

- Jennifer

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**From:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>  
**Date:** Tuesday, May 27, 2025 at 10:49 AM  
**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>  
**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, tgoodyguillen@bakerlaw.com <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, jwasick@bakerlaw.com <[jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)>, Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, Josh Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, Ed Macallister <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>, Marco Molina <[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)>  
**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Jennifer,

Defendants are available tomorrow at 3 pm ET.

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**Sesi V. Garimella | Partner**  
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On May 27, 2025, at 10:22 AM, Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)> wrote:

Counsel,

I am following up on the below. Please advise whether you are available during any of the times we identified. If not, please provide additional times this week that you are available to meet and confer.

- Jennifer

**Jennifer Blecher, Esq. | Partner**  
<image001.png>  
[+1 646.766-1763](tel:+16467661763) (O)

---

**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>  
**Date:** Friday, May 23, 2025 at 12:11 PM  
**To:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>  
**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, tgoodyguillen@bakerlaw.com

<[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)  
<[jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)>, Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake  
Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>,  
Josh Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, Ed Macallister  
<[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>, Molina, Marco <[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings  
Limited et al - Plaintiffs' First RFPs

Thank you Sesi.

Counsel,

We had understood from your colleagues on our call that you would be available Thursday, but in light of Sesi's unavailability we can make ourselves available on Tuesday. We are available from 10 a.m. to 4 p.m. Let us know if that window works for you. If not, we are also available from 10 a.m. to 6 p.m. on Wednesday.

We hope that our next call will be more productive than our prior one. We are now more than a month past the Court's decision on your motion for reconsideration and over two months past the Court's grant of jurisdictional discovery. Thus far, both defendants have served objections to our Requests for Production inconsistent with the Federal Rules in which you have not agreed to produce a single document or specifically identified any objectionable portion of any request. Rather, you relied on vague, boilerplate objections concerning the scope of our requests and offered to meet and confer. We had hoped to do so in good faith. Yet during Tuesday's call, neither defendant could identify what exactly you believed was not within the scope of jurisdictional discovery for any request other than Request No. 4 (with which we do not agree).

Notwithstanding that, neither Defendant agreed to produce documents in response to any of the 14 requests we discussed until we provide you with a "comfort letter" or similar such written representation regarding the scope of jurisdictional discovery. We do not agree to do so. As we stated on Tuesday's call, it is our view that the current set of requests are squarely within the scope of the Court's February 2025 order. The Federal Rules of Civil Procedure do not require a plaintiff to self-circumscribe the permissible scope of a discovery order for any reason - and certainly not to provide Defendants with "comfort" as a precondition for either production or meeting and conferring. We are of course willing to confer regarding any specific request or portion of a request that you believe is outside of the scope of jurisdictional discovery, but for 13 of the 14 requests we discussed, Defendants' objections were based not on the requests themselves but rather on hypothetical, future issues that, at this juncture, Plaintiffs have no need to resolve.

Accordingly, we expect that you will have conferred with your clients prior to next week's call and will be in a position to meaningfully discuss what responsive materials there are and that you are willing to produce. We similarly hope that we can avoid spending excessive time clarifying factual matters referenced in the requests that are sourced from settlement documents that your clients negotiated and agreed to and are therefore in a superior position to understand.

- Jennifer

**Jennifer Blecher, Esq. | Partner**



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---

**From:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>

**Date:** Friday, May 23, 2025 at 11:35 AM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>,

Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, [tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)

<[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)

<[jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com)>, Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake

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<[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>, Molina, Marco <[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)>

**Subject:** RE: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Jennifer,

I believe Marco Molina from Baker was left off the chain. I'm copying him in here.

---

**Sesi V. Garimella | Partner**

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**From:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>

**Sent:** Wednesday, May 21, 2025 5:28 PM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Cc:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>; Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>; Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>; [tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com); [jwasick@bakerlaw.com](mailto:jwasick@bakerlaw.com); Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>; Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>; Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>; Josh Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>; Ed Macallister <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Hi Jennifer,

Unfortunately, I have a conflict at 4 pm. Would Tuesday work?

---

**Sesi V. Garimella | Partner**

**Cahill Gordon & Reindel LLP**

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On May 21, 2025, at 11:47 AM, Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)> wrote:

Counsel,

We are available at 4 p.m. on Thursday to continue the meet and confer and discuss the remaining requests (Nos. 14-19). Please let us know if that time works for you. If so, we will circulate an invite.

- Jennifer

---

**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Date:** Sunday, May 18, 2025 at 10:15 AM

**To:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, 'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, 'Ed Macallister' <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs



Ivan,

3:30 p.m. on the 20<sup>th</sup> works for us.

- Jennifer

---

**From:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>

**Date:** Thursday, May 15, 2025 at 1:21 PM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>, Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, 'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, 'Ed Macallister' <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** RE: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Jennifer:

We are available at 3:30, please let us know if that still works for Plaintiffs.

Thanks,  
Ivan

---

**Ivan Torres | Counsel**

**Cahill Gordon & Reindel LLP**

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---

**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Sent:** Wednesday, May 14, 2025 4:06 PM

**To:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>; Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>; Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>; Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>; 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>; 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>; Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>; Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>; 'Josh

Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>; 'Ed Macallister'  
<[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance  
Holdings Limited et al - Plaintiffs' First RFPs

Counsel,

I am following up on this. Please advise as to your availability on the 20<sup>th</sup>  
so that we may proceed without undue delay.

- Jennifer

**Jennifer Blecher, Esq.** | Partner

<image001.png>  
[+1 646.766-1763](tel:+16467661763) (O)

---

**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Date:** Monday, May 12, 2025 at 11:20 AM

**To:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>, Garimella, Sesi V.

<[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>,

Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>,

'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>,

'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani

<[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>,

'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, 'Ed Macallister'

<[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance  
Holdings Limited et al - Plaintiffs' First RFPs

Ivan,

We are available on May 20 from 10 a.m. to 4 p.m. Let us know if any time  
in that window works for you and your team.

- Jennifer

**Jennifer Blecher, Esq.** | Partner

<image001.png>  
[+1 646.766-1763](tel:+16467661763) (O)

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**From:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>

**Date:** Thursday, May 8, 2025 at 9:15 PM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>, Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, 'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, 'Ed Macallister' <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** RE: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Jennifer:

With apologies for the delay in getting back to you, we have folks with conflicting travel schedules this and next week. Are there times on May 20th or 21st that work for this meet and confer?

Thanks,  
Ivan

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**Ivan Torres | Counsel**

**Cahill Gordon & Reindel LLP**

32 Old Slip, New York, NY 10005

t: +1.212.701.3104 | [ITorres@cahill.com](mailto:ITorres@cahill.com)

[www.cahill.com](http://www.cahill.com)

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**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Sent:** Tuesday, May 6, 2025 3:48 PM

**To:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>; Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>; Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>; Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>; 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>; 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>; Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>; Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>; 'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>; 'Ed Macallister' <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Re: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Counsel,

As contemplated by the Court's order and your objections and responses, we would like to schedule a call to meet and confer. We are available this Thursday at 4 p.m. Please let us know if that time works for all of you.

Regards,

Jennifer

**Jennifer Blecher, Esq.** | Partner

<image001.png>

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**From:** Torres, Ivan <[ITorres@cahill.com](mailto:ITorres@cahill.com)>

**Date:** Friday, May 2, 2025 at 5:38 PM

**To:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>, Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>, Enzer, Samson <[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>, Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>, 'tgoodyguillen@bakerlaw.com' <[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)>, 'wasick@bakerlaw.com' <[wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)>

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>, Jake Nachmani <[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>, Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>, 'Josh Perles' <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>, 'Ed Macallister' <[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** RE: Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Counsel:

Please find attached BHL's Responses and Objections to Plaintiffs' First Set of Requests for Production Relating to Jurisdictional Discovery. BHL is willing to consent to the service of discovery request and responses via email service, subject to Plaintiffs' agreement to the same.

Best,  
Ivan

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**Ivan Torres | Counsel**

**Cahill Gordon & Reindel LLP**

32 Old Slip, New York, NY 10005

t: +1.212.701.3104 | [ITorres@cahill.com](mailto:ITorres@cahill.com)

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**From:** Jennifer Blecher <[jblecher@seidenlaw.com](mailto:jblecher@seidenlaw.com)>

**Sent:** Wednesday, April 2, 2025 6:12 PM

**To:** Garimella, Sesi V. <[SGarimella@cahill.com](mailto:SGarimella@cahill.com)>; Enzer, Samson

<[SEnzer@cahill.com](mailto:SEnzer@cahill.com)>; Bansal, Anirudh <[ABansal@cahill.com](mailto:ABansal@cahill.com)>;

[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com); [wasick@bakerlaw.com](mailto:wasick@bakerlaw.com)

**Cc:** Amiad Kushner <[akushner@seidenlaw.com](mailto:akushner@seidenlaw.com)>; Jake Nachmani

<[jnachmani@seidenlaw.com](mailto:jnachmani@seidenlaw.com)>; Dov Gold <[dgold@seidenlaw.com](mailto:dgold@seidenlaw.com)>; Josh

Perles <[jperles@perleslaw.com](mailto:jperles@perleslaw.com)>; Ed Macallister

<[emacallister@perleslaw.com](mailto:emacallister@perleslaw.com)>

**Subject:** Case 1:24-cv-00697-JGK-BCM Raanan et al v. Binance Holdings Limited et al - Plaintiffs' First RFPs

Counsel,

Please find attached Plaintiffs' First Set of Requests for Production Relating to Jurisdictional Discovery to All Defendants. Please let us know whether you consent to service of discovery requests and responses via email service.

Regards,

Jennifer

**Jennifer Blecher, Esq.**

Partner

<image002.png>

**Seiden Law LLP**

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**O.** [\(646\) 766-1763](tel:(646)766-1763)

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